

EXHIBIT A

DETAINED

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**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
JENA, LOUISIANA**

In the Matter of:)
)
)
Petrova, Kseniia)
) File No. A 240 485 724
)
)
In removal proceedings)
)

Immigration Judge: Richard Jacobs

Next hearing: June 2, 2025

**DEPARTMENT OF HOMELAND SECURITY
MOTION FOR EXTENSION OF DEADLINE TO FILE
RESPONSE TO RESPONDENT'S MOTION FOR CHANGE OF VENUE**

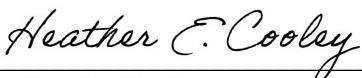
DEPARTMENT OF HOMELAND SECURITY
MOTION FOR EXTENSION OF DEADLINE TO FILE
RESPONSE TO RESPONDENT'S MOTION FOR CHANGE OF VENUE

The U.S. Department of Homeland Security (DHS) by and through the undersigned counsel respectfully requests the Immigration Judge to grant DHS an extension to June 5, 2025 to respond to the respondent's motion for change of venue filed on May 23, 2025. "The Immigration Judge may...extend time limits for making motions and replies thereto." 8 C.F.R. § 1003.23(a) (2025); see also Immigration Court Practice Manual, Chapter 3.1(c)(4). The decision to extend the deadline for filing a motion lies with the discretion of the Immigration Judge. *See Matter of C-*, 8 I&N Dec. 577, 579 (BIA 1960).

DHS's response to the respondent's motion to change venue is due on May 26, 2025. The respondent has a *Mapp* hearing schedule in United States District Court, District of Vermont, on May 28, 2025 and the outcome of that hearing will determine whether a change of venue of her immigration court proceeding is proper.

In sum, the above-referenced circumstances of this case present good cause for an extension of time for DHS to file a response to the respondent's motion for change of venue. Accordingly, DHS respectfully moves the Immigration Judge to extend the filing deadline to June 5, 2025.

Respectfully submitted on this the 23rd day of May 2025,



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